



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

NS
F.#2020R00275

*271 Cadman Plaza East
Brooklyn, New York 11201*

October 8, 2021

By E-Mail and ECF

Mr. Douglas Morris, Esq.
Federal Defenders of New York, Inc.
Eastern District of New York
One Pierrepont Plaza, 16th Floor
Brooklyn, New York 11201

E-Mail: douglas_morris@fd.org

Re: United States v. Donnell Russell
Criminal Docket No. 20-427 (AMD)

Dear Mr. Morris:

Enclosed please find additional discovery in the above-captioned case in accordance with Rule 16 of the Federal Rules of Criminal Procedure. The government also continues to request reciprocal discovery from the defendant. Enclosed please find copies of the following items.

<u>Discovery Exhibit</u>	<u>Description</u>
27	Illinois Secretary of State DMV records for Donnell Russell
27a	Business Records Certification
28	Illinois Secretary of State DMV records for June Barrett
28a	Business Records Certification

29	Birth certificate for Donnell Russell
30	T-Mobile Records for Telephone Number (312) 513-1020
30a	Business Records Certification
31	Emails addressed to or sent from colondunn@yahoo.com ¹
32	Search Warrant Return for Facebook page Surviving Lies
32a	Business Records Certification
33	Subscriber records from Apple Inc.
33a	Business Records Certification
34	Subscriber records from Apple Inc.
34a	Business Records Certification
35	Text messages between (312) 203-3030 and Jane Doe #1 and Jane Doe #2
36a	Forensic report of text messages between two individuals identified in file name
36b	Forensic report of subset of relevant text and MMS messages in DX 36a in chat format
37	Civil lawsuit pertaining to an individual
38	Transcript for a previously produced video clip (DX 1, Clip 1)
39	Transcript for a portion of a previously produced video clip (DX 1, Clip 3)
40	Emails addressed to or sent from ib.drussell@gmail.com ²
41	Text messages between Donnell Russell and an individual
42	AT&T Records for Telephone Number (312) 203-3030

¹ These emails were previously produced to you on August 27, 2020 as part of the larger production of the search warrant return on this email account (DX 8).

² These emails were previously produced to you on August 27, 2020 as part of the larger production of the search warrant return on this email account (DX 7).

42a	Business Records Certification
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Very truly yours,

JACQUELYN M. KASULIS
Acting United States Attorney

By: /s/
Elizabeth Geddes
Nadia Shihata
Maria Cruz Melendez
Assistant U.S. Attorneys
(718) 254-7000

Enclosures

cc: Clerk of the Court (by ECF) (without enclosures)